

REMARKS

This amendment is in response to the Office Action of March 23, 2006 in which claims 1-3, 5-17 and 19-35 were rejected and claims 4 and 18 were objected to.

In Section 3, claim 33 was objected to because of the following informalities: Claim 33 appears to depend on claim 32 instead of claim 1. The appropriate correction is made.

In Section 4, claims 8, 9, 32-33 were rejected under 35 U.S.C. 112, first paragraph as failing to comply with the enablement requirement.

The corrections are made and/or arguments are presented to obviate the rejection 35 U.S.C. 112, first paragraph of claims 8, 9, 32-33. Claims 8 and 9 are amended to clarify what "identical" vs. "not identical" means; this amendment is strictly for clarification purpose of these terms without adding a new matter; similar amendments are presented for the paragraph of the specification, page 16, line 19.

Regarding claim 32, the applicant believes that claim 32 is fully supported by the specification; the data relocation using physical address Y and the first memory pointer is fully described in great detail in the specification (see Figures 1a-1d, 2a-2c, 3, Table 1 and the appropriate text). For example, in the description of figure 3, on page 16, lines 5-18, the pointer signal 34 containing a physical address Y and optionally the first memory pointer M is described in detail. To make claim 32 clearer

small amendments for the clarification purpose only are introduced in claim 32. The scope of the paragraph of claim 32 questioned by the Examiner is equivalent to the scope of claim 22 with just substituting the name of the blocks by means plus functions.

In Section 5, claims 15, 32-33 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The corrections are made to obviate the rejection 35 U.S.C. 112, second paragraph of claims 15, 32-33. The scope of the paragraph of claim 32 questioned by the Examiner is equivalent to the scope of claim 22 with just substituting the name of the blocks by means plus functions. In other words, the pointer signal in claim 32 is provided in response to the update signal to the "means for providing the data-relocation signal", and the pointer signal comprises Y and M.

In Section 6, claims 1, 2, 5-17, 20-22, 24-32 and 34 were rejected under 35 U.S.C. 102(e) as being anticipated by Chang et al. of U.S. Publication 2004/0177212.

The applicant presents here a claim amendment in independent claims 1, 20, 32 and 34 related to not using information on a usage of memory blocks for the copying or relocating of those blocks. This amendment is fully supported by the specification (e.g., see page 11, lines 6-7). The reference of Chang et al. does not describe this limitation at all. On the contrary, Chang et al. uses the information on the usage of memory blocks for the copying

or relocating (e.g., see steps 404, 408, 416, 428 in Figure 4 of Chang et al.) of those blocks. Therefore, the amended claims 1, 20, 32 and 34 are not anticipated by Chang et al. under 35 U.S.C. 102(e).

Regarding claims 2, 5-17, 21-22, 24-31, 33 and 35 these are dependent claims of independent claims 1 and 20. Independent claims 1, 20, 32 and 34 are not anticipated by Chang et al., as shown above. Since each of the dependent claims 2, 5-17, 21-22, 24-31, 33 and 35 narrows the scope of the novel and non-obvious independent claims 1 and 20, non-obviousness of claims 1, 20, 32 and 34 will compel non-obviousness of claims 2, 5-17, 21-22, 24-31, 33 and 35.

Moreover, the arguments presented by the Examiner for rejecting the dependent claims are further discussed. The Applicant believes that some of the Examiner's statements are not accurate and need further clarification. The Examiner's arguments are analyzed based on MPEP guidelines which are stated in the MPEP Paragraph 2131 as follows:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987), MPEP 2131. "The identical invention must be shown in as complete details as is contained in the . . . claim", *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

For example, regarding independent claim 10, contrary to the Examiner's statement, more than one trigger signal is

not described by Chang et. in order to satisfy the MPEP Paragraph 2131 quoted above.

Furthermore, the time clock pulse recited in claim 13 is not recited by Change et al. The argument that the time clock pulse is an inheritance feature in the computer art is not enough to satisfy the MPEP Paragraph 2131 quoted above, because all of the features of claim 13 and others are well known in the art as a separate feature but not in combination recited in claim 13. Similar arguments can be applied to claim 14.

Regarding claim 17, blocks 416 and 420 of figure 4 in Change et al. do not describe at all that all the data contained in the multi-block memory is copied or relocated at the same time as recited in claim 17.

Also in regard to claim 26, it is questionable the reference made by the Examiner to the finite state machine which is not described by Change et al. as required by the MPEP Paragraph 2131 quoted above.

More arguments regarding other dependent claims can be presented if requested.

Other claim amendments are: a) claim 16 is cancelled; b) reference numbers are removed from the claims.

The objections and rejections of the Office Action of March 23, 2006 having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of claims 1-35 to issue is solicited.

Respectfully submitted,



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